

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ASTRAZENECA AB,  
AKTIEBOLAGET HÄSSLE and  
ASTRAZENECA LP,  
KBI INC. and KBI-E INC.,

Plaintiffs and  
Counterclaim-Defendants,

v.

DR. REDDY'S LABORATORIES, LTD. and  
DR. REDDY'S LABORATORIES, INC.

## Defendants and Counterclaim-Plaintiffs.

07-CV-6790 (CM)(FM)

**ASTRAZENECA'S MOTION TO FILE UNDER SEAL  
EXPLANATION OF INFRINGEMENT DISCOVERY  
AND ATTACHED EXHIBITS**

Plaintiff AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc. and KBI-E Inc. (collectively “AstraZeneca”) respectfully moves this Court for an order sealing its *Plaintiff AstraZeneca’s Explanation Of Infringement Discovery* and attached exhibits, including *Plaintiff AstraZeneca’s First Set Of Requests For Production Of Documents And Things On The Merits* (Nos. 1-6), *Plaintiff AstraZeneca’s Second Set Of Interrogatories To Defendants Dr. Reddy’s Laboratories, Ltd. And Dr. Reddy’s Laboratories, Inc.* (Nos. 11-12), and *Plaintiff AstraZeneca’s Notice Of Deposition Of Defendants Dr. Reddy’s Laboratories, Ltd. And Dr. Reddy’s Laboratories, Inc. Pursuant To Fed. R. Civ. P. 30(b)(6)*.

In support of this motion, AstraZeneca states that the Explanation and attached exhibits contain information Defendants assert is confidential.

Accordingly, AstraZeneca respectfully requests that the Court order that AstraZeneca's Explanation and attached exhibits be filed under seal and that they only be accessible by the Court and the parties.

A proposed order is submitted herewith.

Date: November 19, 2007

By: 

Errol B. Taylor (ET 6742)

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Attorneys for Plaintiffs

ASTRAZENECA AB,

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ASTRAZENECA LP, KBI INC.

AND KBI-E INC.

**CERTIFICATE OF SERVICE**

I certify that on this 19th day of November 2007, I caused a true and correct copy of the foregoing **ASTRAZENECA'S MOTION TO FILE UNDER SEAL EXPLANATION OF INFRINGEMENT DISCOVERY AND ATTACHED EXHIBITS** be served upon counsel for DRL in the following manner:

**BY FEDERAL EXPRESS & FACSIMILE**

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